

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:25-CV-

UNITED STATES OF AMERICA,

Plaintiff,

v.

BEGINNING BROADNAX
CONSULTING CO., (D/B/A B & W
FARMS) REAL PROPERTY:

REAL PROPERTY LOCATED AT 954
WHIPPOORWILL TRAIL, BRODNAX
VIRGINIA 23920, AS MORE
PARTICULARLY DESCRIBED IN A
DEED, ALL THAT CERTAIN LOT OR
PARCEL OF LAND BEING AND
SITUATE IN MEHERRIN
MAGISTERIAL DISTRICT,
BRUNSWICK COUNTY, VIRGINIA,
TOGETHER WITH IMPROVEMENTS
AND APPURTENANCES, LOT 5,
CONTAINING 20 ACRES, SHOWN ON
THE PLAT OF CRUTCHFIELD AND
ASSOCIATES, INC., DATED MARCH
1, 1993, WHICH PLAT IS RECORDED
IN THE CLERK'S OFFICE OF THE
CIRCUIT COURT OF BRUNSWICK
COUNTY, VIRGINIA IN PLAT BOOK
13, PAGE 8. AND BEING TITLED IN
THE NAME OF BEGINNING
BROADNAX CONSULTING CO.,
(D/B/A B & W FARMS) AND ANY AND
ALL PROCEEDS FROM THE SALE OF
SAID PROPERTY,

**COMPLAINT FOR FOREITURE
IN REM**

Defendant.

The United States of America, by the United States Attorney for the Eastern

District of North Carolina, states as follows:

1. This is a civil action *in rem* brought to enforce the provision of 18 U.S.C. § 981(a)(1)(C) providing for the forfeiture of property constituting or derived from proceeds traceable to offenses constituting “specified unlawful activity”, as well as the provisions of 18 U.S.C. § 981(a)(1)(A) providing for the forfeiture of property involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 or 1957, or any property traceable to such property. The defendant real property constitutes or is derived from proceeds traceable to specified unlawful activity, specifically Title 18, United States Code, Section 1343 (wire fraud) and/or 666 (theft concerning programs receiving Federal Funds), or was involved in transactions or attempted transactions in violation of Title 18, United States Code sections 1956 or 1957 (collectively, the “Subject Offenses”), and is therefore subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(A) and (C).

2. This Court has subject matter jurisdiction over this matter by virtue of 28 U.S.C. §§ 1345 and 1355(a). The Court has in rem jurisdiction by virtue of 28 U.S.C. § 1355(b). Venue in this district is proper by virtue of 28 U.S.C. § 1395(b).

3. The defendant real property has not been seized but is located at the following address:

a. 954 Whippoorwill Trail, Brodnax, Virginia 23920;

The defendant real property is more particularly described in Exhibit A which is appended hereto and incorporated herein by reference.

4. The record owner of the real property described in Exhibit A is

Beginning Broadnax Consulting Co., (D/B/A B & W Farms). The following may have interests in this real property: Beginning Broadnax Consulting Co., (D/B/A B & W Farms), the Brunswick County Tax Administrator, and any lienholders found during a title search.

5. The facts and circumstances supporting and providing a reasonable basis for the forfeiture of the defendant property are contained in Exhibit B, Declaration of Special Agent Julia Hanish of the Federal Bureau of Investigation, which is attached hereto and incorporated herein by reference.

6. The defendant is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and (C).

7. The United States does not request authority from the Court to seize the defendant real property. The United States will, as provided by 18 U.S.C. § 985(b)(1) and (c)(1):

- a. post notice of this action and a copy of the Complaint on the defendant real property;
- b. serve notice of this action, along with a copy of this Complaint, on the defendant real property owner and any other person or entity who may claim an interest in the defendant, including but not necessarily limited to those persons or entities identified herein; and
- c. file a *lis pendens* in county records of the defendant real property's status as a defendant in this *in rem* action.

WHEREFORE, the United States of America prays that judgment be entered declaring the defendant real property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of

America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted this 6th day of February, 2025.

DANIEL P. BUBAR
Acting United States Attorney

BY: /s/ Katherine A. King
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VERIFICATION

I, Special Agent Julia Hanish of the Federal Bureau of Investigation (FBI), declare under the penalty of perjury, as provided by 28 U.S.C. § 1746, the foregoing Complaint for Forfeiture is based on reports and information by or furnished to me and, to the best of my information and belief, is true and correct.

This the 24 day of January, 2025.

A handwritten signature in black ink, appearing to read 'Julia Hanish', is written over a horizontal line.

JULIA HANISH
Special Agent
Federal Bureau of Investigation